

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833
(916) 263-0916 Phone
(916) 263-0959 Fax
Email: BSC@dgs.ca.gov

Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 18, 2008
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: MAY 12, 2008

Date: May 1, 2008

From: Mark Pawlicki

Name (Print or type)

Sierra Pacific Industries

Agency, jurisdiction, chapter, company, association, individual, etc.

P.O. Box 496028 Redding CA 96049

Street City State Zip

I/We ☒ (do) ☐ (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 705.2.1 and 805.3

and request that this section or reference provision be recommended:

☐ Approved ☐ Disapproved ☐ Held for Further Study ☒ Approved as Amended

to the proposing state agency.

Suggested Revisions to the Text of the Regulations:

Section 705.2.1 (Certified Wood Products) contains a reference to the Sustainable Forestry Initiative Standard 2005-2009. We concur that this is a valid forest certification program that should be recognized, but when it is revised in 2009, this regulation might not be applicable the way it is written. We suggest you either drop the reference to the years 2005-2009, or add "or its successor Standard." That way, it will be recognized after the 2009 update to the Standard.

Similarly, the reference to The American Tree Farm System in this section has the same issue. This is also a valid forest certification program, and the reference could be corrected by either dropping the reference to the 2004-2008 Standard, or add "or its successor Standard."

With regard to Section 805.3 (Moisture Content of Building Materials), we concur with the regulation as proposed.

Reason: [The reason should be concise. If the request is for "Disapproval," "Further Study," or "Approve As Amend", identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Reference to (a) (7).

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
 - (8) The format of the proposed building standards is consistent with that adopted by the commission.
 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.